

Hearing Date: June 14, 2012 at 9:45 a.m.  
Objection Deadline: June 7, 2012 at 4:00 p.m.

**PILLSBURY WINTHROP SHAW PITTMAN LLP**

1540 Broadway  
New York, NY 10036  
(212) 858-1000 (Phone)  
(212) 858-1500 (Fax)  
Nickolas J. Karavolas (NK-0324)

*Counsel for Wells Fargo Bank, N.A.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	)	
	)	Chapter 11 Case No.
MOTORS LIQUIDATION COMPANY, <i>et al.</i>	)	
f/k/a General Motors Corp., et al.	)	09-50026 (REG)
	)	
Debtors.	)	Jointly Administered
	)	

**NOTICE OF MOTION OF WELLS FARGO BANK, N.A.  
FOR AN ORDER DIRECTING DISBURSEMENT  
OF CLAIM DISTRIBUTIONS TO SECURED PARTY**

**PLEASE TAKE NOTICE** that upon the annexed Motion, dated May 16, 2012, of Wells Fargo Bank, N.A. (“**Wells Fargo**”) for an order directing that all distributions on account of Claim No. 04957 filed by Del Norte Chevrolet-Olds Co. and James Larry Allen be made to Wells Fargo, all as more fully described in the Motion, a hearing will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 on June 14, 2012 at 9:45 a.m.,<sup>1</sup> or as soon thereafter as counsel may be heard.

**PLEASE TAKE FURTHER NOTICE** that any responses or objection to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by

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<sup>1</sup> All times stated are Eastern Standard Time.

registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a CD-ROM or 3.5 inch disc, preferably in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent practicable, and served in accordance with General Order M-399, and in accordance with this Court's Sixth Amended Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures dated May 5, 2011 so as to be received no later than June 7, 2012 at 4:00 p.m. (the "**Objection Deadline**").

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served with respect to the Motion, Wells Fargo may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which may be entered with no further notice or opportunity to be heard offered to any party.

New York, New York  
Dated: May 16, 2012

Respectfully submitted,  
/s/ Nickolas J. Karavolas  
PILLSBURY WINTHROP SHAW PITTMAN LLP  
1540 Broadway  
New York, New York 10036  
Telephone: (212) 858-1000  
Facsimile: (212) 858-1500